

Brian Houseal, Chair  
U.S. National Advisory Committee  
Adirondack Council  
103 Hand Avenue, Suite 3  
Elizabethtown, NY 12932

Dear Mr. Houseal:

On behalf of Administrator Gina McCarthy, I would like to thank you for the National Advisory Committee (NAC) letter of advice of May 12<sup>th</sup>, 2015 reporting on the forty-fourth meeting held on April 16-17, 2015 at the EPA Headquarters in Washington, D.C.. We appreciate the NAC's commitment to advance the mission of the CEC through the advice provided on tri-national environmental issues and their support to our Administrator.

I was sorry that I could not join you in person, but was very happy that other knowledgeable members of my staff were able to participate fully to provide feedback and respond to your concerns. As you know, we value our relationship with the GAC committee members and appreciate very much the value added they bring to the work of the CEC.

***Recommendations on Charge Questions 1:***

***(Draft Strategic Plan 2015-2020 and Draft Operational Plan 2015-2016):***

- (1) Redesign Projects #12 & #13 to address the highest priority threats to the monarch butterfly, especially the loss of milkweed habitat due to the use of the herbicide glyphosate.*

With respect to your suggestion that Projects #12 – on Engaging Farmers and other Landowners to Support Monarch Butterfly and Pollinator Conservation, and #13- on the Monarch Butterfly Flyway are premature and should be delayed until regulatory sideboards are established, we must respectfully disagree. Since the February 19, 2014 meeting of the North American Leaders Summit (NALS) in Toluca, Mexico, where President Obama, President Peña-Nieto and Prime Minister Harper committed to, among many things, undertake joint conservation efforts of the monarch butterfly, US government officials from the EPA and the Department of Energy have met at the highest levels to determine the best way to respond to the Presidents' call for action, with DOE Secretary Jewell and EPA Administrator Gina McCarthy leading that effort.

Earlier this year the US Fish and Wildlife Service announced a major new funding initiative with the National Fish and Wildlife Foundation (NFWF), pledging \$2 million in immediate funding for on-the-ground conservation projects around the country. This June, EPA outlined approaches for actions to protect the monarch butterfly, soliciting public comment on which potential action or combination of actions would be most effective to reduce the impacts of herbicides on the monarch and other pollinators and their habitat. The agency also requested additional suggestions for protection measures. Including the two monarch projects in the CEC Operational plan was another way of showing the Council's support and direct engagement in creating a safe haven for the Monarch across North America.

- (2) Urges CEC Secretariat to initiate Article 13 report on hydro-fracking;*
- (3) Produce an Article 13 report on the potential environmental benefits of renewable energy sources and distributed generation throughout North America.*
- (4) Produce an Article 13 report on Traditional Ecological Knowledge as an initial product of the newly formed TEK expert group.*

Pursuant to Article 13 of the North America Agreement on Environmental Cooperation (NAAEC), the Secretariat can prepare a report on any environmental issue within the scope of the operational plan or on any other environmental matter related to North America by notifying Council of its intent; and may proceed only if the Council does not object within 30 days after such notification. Thus, Article 13 reports are meant to be initiated by the Secretariat, rather than the Council; with the Council's role being limited to consenting to the Secretariat's proposal or to opposing it within 30 days of the initial notification from the Secretariat.

- (5) Consider a North American assessment of water as a trade resource and incorporate the concept of a product's 'water footprint' as an important component in the face of accelerating climate change.*

Thank you for the suggestion that we consider a NA assessment of water as a trade resource incorporating the concept of 'water footprint'. This is a very interesting concept and one that promises to be instrumental in a future where clean, potable water becomes scarce, as research indicates that the average American lifestyle is fueled by nearly 2,000 gallons of water a day, but only five percent of runs through our toilets, taps and garden hoses at home. Nearly 95 percent of our water footprint is hidden in the food we eat, the energy we use, the products we buy and the services on which we rely. Assessing water as a trade resource, however, may be beyond the capabilities of the Secretariat to accomplish at this time.

***Recommendations on Charge Question 2 (NAPECA Grants):***

- (1) The NAC respectfully recommends that the CEC set NAPECA priorities which reflect the cross-cutting themes of the 2015-2020 Strategic Plan, and select a focal area for a two to three year grant cycle, such as TEK or water resources in vulnerable communities.*

Thank you for your recommendations. The 2015-2016 NAPECA announcement provided the historical range of grant amounts as a guide for grant proponents so they could know the potential upper and lower limits of grant award amounts. The Call for Proposals also established a focus area for "Sustainable communities and urban initiatives" which we think is specific enough to support the 2015-2020 Strategic Plan and broad enough to include a wide range of community-level initiatives. Furthermore, this announcement requests identification of how the project could be replicated in other North American Communities as well as the information on other funding sources. As to your advice that small organizations mentor with Universities or larger organizations, project proponents are encouraged to create partnerships,

either formal or informal, including at the indigenous community level, and to identify the beneficiaries and target population of proposed projects.

***Recommendations on Charge Question 3: Communication***

- (1) *The NAC respectfully recommends that the CEC identify selected target audiences who should be aware of, and involved in, the CEC's mission and who may benefit from its activities. Different communications techniques such as social media or radio may be needed to reach small, remote and vulnerable communities.*
- (2) The NAC further recommends that the CEC communicate with law schools and policy NGOs specifically about the SEM process and encourage their engagement.

Thank you for this recommendation. The NAPECA 2015 Call for Proposals established a focus area for “Sustainable communities and urban initiatives” which we think is specific enough to support the 2015-2020 Strategic Plan and broad enough to include a wide range of community-level initiatives. Proponents are also encouraged to create informal partnerships, including at the indigenous community level, and identify the beneficiaries and target population of proposed projects.

As always, we appreciate and value the guidance you provide to this important program, and look forward to continuing to work together to strengthen the CEC as a catalyst for cooperative action.

Sincerely,

Jane Nishida  
Assistant Administrator

Office of International and Tribal Affairs